



**Environmental
Operations, Inc.**
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AWMD/WRAP-KNRP

July 15, 2013

Mr. Bruce Morrison
Project Manager
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, KS 66219

RE: Monthly Progress Report
Solutia – John F. Queeny Plant
St. Louis, Missouri
EPA ID No. MOD 004 954 111

Dear Mr. Morrison:

Environmental Operations, Inc. (EOI), on behalf of SWH Investments, is providing this Monthly Progress Report for the John F. Queeny Plant formerly owned by Solutia. We are providing this Progress Report in order accordance with the reporting requirements of the EPA Docket No. RCRA-07-2009-0015 Consent Order which became effective December 18, 2009. Per the Interim Measures Work Plan, these reports will be submitted every month.

Reporting Period

June 1, 2013 – June 30, 2013

Description of the work conducted pursuant to the Order during the reporting period.

- EOI completed and submitted the semi-annual groundwater data report.
- EOI deferred further delineation in the VV Area for PCB concentrations less than 100 and greater than 10 parts per million (ppm). Renewal of the waste disposal profile was reviewed. Delineation work will occur following additional removal of soil in the VV area identified during initial delineation as having greater than 100 ppm PCBs.
- EOI reviewed the initial plan by Regenesys for design of the final injection event. The type and amount of material to be injected, locations, and water removal to potentially improve effectiveness are still being evaluated.

Estimate of the percentage of the project completed during the reporting period

- 1%

RCRA



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Description of the projects scheduled for completion during the reporting period which were not completed; statement explaining why and updated completion date.

- Not applicable.

Copies of all data and sampling and test results and all other laboratory deliverables received by Respondent during the reporting period.

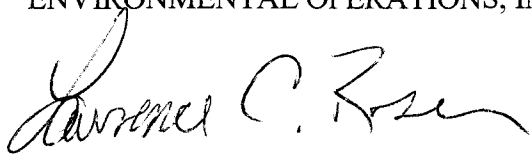
- Not applicable.

Description of the projects and actions which are scheduled for the following reporting period.

- EOI will continue design work with Regenesys for the final injection event. Due to the changes in the design to be resolved, the schedule anticipates injection in August 2013.
- EOI will initiate and complete the scheduled quarterly groundwater monitoring in July.
- EOI will work with Heritage to update the waste profile information for disposal of PCB soil from the VV Building in preparation for additional removal of soil with greater than 100 ppm PCB. After that is accomplished, scheduling of the work will occur.
- EOI/SWH will continue to work with the EPA regarding financial assurance information modifications and will respond accordingly.

If there are questions or concerns related to this Progress Report please contact Larry Rosen who can be reached by phone at (314) 480-4694, or via email at larryr@environmentalops.com.

Respectfully submitted,
ENVIRONMENTAL OPERATIONS, INC.



Lawrence C. Rosen, R.G.
Senior Project Manager

Copy: Mr. Michael House/Solutia
Ms. Christine Kump-Mitchell/MDNR
Mr. Rich Nussbaum/ MDNR